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**To:** [Delta.Plan.Comments@Deltacouncil](mailto:Delta.Plan.Comments@Deltacouncil)  
**Subject:** Draft 3 Comments from the City of Manteca  
**Date:** Thursday, May 05, 2011 2:10:22 PM

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May 5, 2011

Mr. Phil Isenberg, Chair  
Delta Stewardship Council  
980 Ninth Street, Suite 1500  
Sacramento, California 95814

Subject: City Of Manteca Comments, Third Draft – Delta Plan

Dear Chairman Isenberg and Members of the Council:

The following comments are submitted from the Floodplain Administrator for the City of Manteca.

Chapter 7 of the draft contains several policies and recommendations related to flooding within the Delta. This document, as currently written, serves only to confuse, and in some cases contradict, current and proposed policies. This document should not change any floodplain management policies. Floodplain land use management is a difficult problem, further complicated by ongoing efforts by the Federal Government (Army Corps of Engineers and the Federal Emergency Management Agency) and other agencies of the State government, led by the Department of Water Resources. Any problems with floodplain management should be addressed by these recognized experts, using established procedures, and supported by scientific data and engineering analysis.

Unfortunately, I do not have time nor staff support that would allow me to provide line-by-line comments on this chapter, but the entire seventh chapter is deeply flawed by generalities, false assumptions, and policies developed without complete analysis. These policies will have significant impact on local land use, and cannot be made so arbitrarily.

As one specific example, the City of Manteca could be affected by RR P3 on page 89. We are nearing the end of a long, thorough review of our floodplains by FEMA. FEMA has made floodplain and floodway determinations based on thorough analysis. This document seeks to overturn or override all of that by establishing an arbitrary floodplain or floodway that does not appear to have any hydrological basis. Although it is not at all clear what the boundaries of the new floodplain would be, it is likely that parts of this area in the City of Manteca are already developed, and other areas have entitlements in place. It is unacceptable for the Delta Plan to impose arbitrary restrictions such as are recommended here.

In general, the Chapter related to flooding needs to be rewritten to refer to and be consistent with the Central Valley Flood Protection Plan, FEMA flood zones, and the 200-year restrictions for urban and urbanizing areas under development by DWR. Instead of imposing new restrictions arbitrarily

and in conflict with FEMA and DWR, this chapter should discuss floodplain management impacts on the Delta, recommend areas for further study, and request that the appropriate agencies, such as FEMA and the Central Valley Flood Protection Board, study these impacts on the Delta and implement needed changes to current floodplain management.

If you have further questions, please contact me at [jstone@ci.manteca.ca.us](mailto:jstone@ci.manteca.ca.us), or by phone at (209) 456-8426.

Jim Stone  
Floodplain Administrator  
City of Manteca

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